

INTRODUCTION

Combe Estate are long standing generational owner of large areas of agricultural and forestry land within East Devon. Their land interests are primarily in Honiton and Gittisham. As part of its interests, the Estate undertakes residential and commercial development and are the owners of Combe Garden Centre. The Estate therefore has a wide range of land and business interests within the district.

The Estate has provided representations to the Council as part of previous consultations on the draft local plan and via the related call for sites process.

Given the nature of their long-standing presence in the district, The Estate is an important local stakeholder with allocation interests within the proposals in the East Devon Local Plan for future development in the district.

Against this background, Bell Cornwell LLP has reviewed the policies and information set out in the East Devon Local Plan (2020 -2042) Regulation 19 Consultation Draft and makes the following representations.

CHAPTER 5. DEVELOPMENT IN THE TOWNS AND VILLAGES

Strategic Policy SD03: Honiton and its Development Allocations

Combe Estate supports the development allocations for Honiton listed in Strategic Policy SD03 and identified on the Policies Map, particularly Land west of Hayne Lane (site reference Gitti_03, Gitti_04 and Gitti_05) for which they have existing land interests. They are also part owners of Land adjacent to St Michael's Church (site reference Honi_07). The Estate are committed to seeing both of their sites and respective allocations delivered.

Site Specific – Gitti_03, Gitti_04 and Gitti_05

The inclusion of Gitti_03, Gitti_04 and Gitti_05 for mixed use development is clearly supported as its represents a logical approach to development and growth to the west of Honiton, noting:

- the position of Honiton within the settlement hierarchy for East Devon;
- the sustainable transport options and overall level of services and facilities in the town;
- the proximity of the site to the A30

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- The location of the site relative to existing jobs and food retail provision within the town of Honiton;
- The constraints that exist elsewhere in the settlement (for example this site can be delivered entirely outside of the AONB).

Strategic Policy SD03 is considered to be sound, though we would recommend some modest tweaks/changes to wording. The specific policy allocating Gitti_03, Gitti_04 and Gitti_05 states;

“Land west of Hayne Lane (Gitti_03, Gitti_04 and Gitti_05)

Land to the west of Hayne Lane, on the western side of Honiton, is allocated for a mixed-use development to provide:

A. 310 homes; and

B. 14.6 hectares of land to accommodate employment and community uses.

This allocation will need to come forward on the basis of an agreed masterplan for the whole site that clearly demonstrates how comprehensive development will be undertaken and implemented. Southern parts of the site are in the East Devon National Landscape and this area will require very careful design to take account of its landscape setting. On the western edges the site is close to the historic village of Gittisham and particular sensitivity will need to be attached to preventing adverse heritage impacts. These southerly and westerly parts will be best suited for open space uses.

Commercial and employment uses will need to be concentrated to the north of the railway line bisecting the site with residential uses to the south. Community facilities, to include a shop or shops and a hall, will need to be provided within or next to 84 residential parts of the development. There will be the need for attractive and safe pedestrian and cycle linkages between the southern and northern parts of the site (ideally utilising an existing passage under the railway that lies in a roughly mid-way point in the allocation).

It is expected that vehicular access to the residential development will be via the existing estate to the north (i.e. via Meadow Acre Road). Vehicular access to the employment development will need to come via Hayne Lane. The development will need to maximise opportunities for localised improvements/contributions to enhance sustainable travel modes, including bus services.”

In terms of the objectives of the policy we would draw attention to the masterplan submitted in support of the current representation. We would ask that it is noted that:

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- The Estate are committed to seeing the site delivered for a minimum of 310 homes.
- The Estate are committed to delivering the area of land to the north of the allocation which comprises part of the 14.6 hectares of employment and community uses (note part of this is land owned by EDDC) – however, additional flexibility should be built into the definition of uses permitted in this part of the policy to include wider commercial uses and leisure uses.
- The need for masterplanning of the sites is noted, and this can be controlled in-part, through an outline planning application.
- The development can be accommodated without being located within the East Devon National Landscape and account can be taken of landscape setting.
- Similarly, the evolving masterplan takes account of the topography and proximity of the historic village of Gittisham on the western edge the site which has taken account of topographical features and heritage assets.
- Both of the areas above can be utilised for BNG delivery and open space to ensure appropriate setting is retained for heritage assets and landscape designations.
- The Estate are happy to provide community facilities, to include a shop or shops and a hall as part of any wider masterplanned development.
- The importance of attractive and safe pedestrian and cycle linkages between the southern and northern parts of the site are also noted and deliverable.
- In terms of vehicular access to the residential development – this should not be solely from Meadow Acre Road – which is located within an adjacent development. Access will be available from Hayne Lane (as per transport / access notes submitted at the Reg.18 stage) and shown on the masterplan, with a secondary route potentially available from Higher Ash Close.

As such, the allocation of the site for residential development is sound and supported by appropriate officer assessment in the submitted evidence base.

Site Specific – Honi_07

The Estate are in control of land identified as Honi_07 – this was previously put forward as an allocation for 30 dwellings in previous versions of the plan. The client's land can be accessed directly from Waterleat Avenue to the north.

During the preparation of the Regulation 19. Version of the Local Plan, Members have decided to allocate Honi_12 (land east of Cuckoo Down Lane) as additional development land. This site is landlocked and access would need to come through our client's land for delivery. Our client has no objection to the principle of this approach, but, given Honi_07 is road fronting this part of the allocation will need to come forward first to facilitate access to the wider development.

As drafted, the allocation states:

Land adjacent to St Michaels Church and south east of Cuckoo Down Lane (Honi_07 and Honi_12)

This land is allocated for 101 homes and will form a residential extension on the southern side of Honiton. The site is in the Blackdown Hills National Landscape area and close to heritage assets, it will require very careful design to take account of its landscape setting and the setting of surrounding heritage assets. Therefore a high quality comprehensive development scheme is required for the whole site. Development within allocation Honi_12 is expected to be dependent on development within allocation Honi_07 coming forward, as access needs to be from Weatherill Road. The development will need to maximise opportunities for localised improvements/contributions to enhance sustainable travel modes.”

As drafted, the policy notes the different land ownerships and clearly Honi_07 will need to come forward first to secure access to Honi_12.

Our client is also aware that Honiton Town Council may object to Hon_12 (the additional land beyond our client’s ownership) as an allocation through this process. This has been reported prior to the consultation on this stage of the Local Plan.

Should this be the case, and any further objections raised to the wider allocation, our client would also be prepared to deliver their site as a single allocation for circa 30 dwellings, which previous proofing layouts provided with our reg 18. Submission (and submitted again now for completeness) show can be accommodated on the site. However, we wish to stress that the site can also come forward as part of a first phase of larger development for circa 101 houses if this is felt appropriate.

They key issues to stress here, is that The Estate’s land is deliverable. Technical work undertaken to date demonstrates the site is deliverable and it be delivered as a first phase of comprehensive development with the ability to connect to adjacent land parcels.

Summary Position / Conclusion

Combe Estate are of the view that both of their allocated sites represent sustainable development, and these are deliverable and suitable site for residential led mixed use development that will help meet the overall housing needs in Honiton and East Devon.

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It will provide much needed housing and new employment space for growth in the main centre of Honiton. The site will also assist in meeting affordable housing requirements in the town and the wider East Devon area where there is significant under supply.

Both sites are immediately available for development and The Estate are committed to seeing the sites delivered for their allocated uses.

The Estate generally support the Council's approach to the spatial strategy and residential land allocations and consider that these are sound, justified and positively planned. However, the drafting of some of the policy could be clarified through the provision of further detail whilst some policies will benefit from the inclusion of more flexibility.

Combe Estate's key comments on the allocations they are promoting through the Regulation 19 Publication Draft can be summarised as:

- Honiton is suitably identified as a 'main centre' in the settlement hierarchy and is rightly a location for significant growth.
- Combe Estate are supportive of the direction of strategic employment policy and will deliver the allocation that has been proposed on their land – however, the definition of 'employment' should not be too narrow, and there should be the ability to include a variety of alternative uses (including a wider range of commercial and tourism based uses) to recognise the modernisation of the East Devon job market and to ensure that East Devon is not prevented from embracing new and emerging businesses to the area.
- Affordable housing percentages for allocated sites need to be closely appraised and set as low as is reasonably possible to ensure development is viable – this is particularly relevant in Honiton where current AH levels on open market schemes are sought at 25% and with this percentage figure increasing with the next Local Plan.
- Where masterplans are proposed for strategic allocations, further guidance/clarification is needed on these matters – could this not be addressed through a planning application (outline) rather than a masterplan/design code approach?
- BNG requirements should be amended to form a consistent position with national policy on its' delivery e.g. 10% should be sought rather than 20%.